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Attorneys for Plaintiff Perfect 10, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California
corporation,

Plaintiff,

v.

YANDEX N.V., a Netherlands limited
liability company, and DOES 1 through
100, inclusive, inclusive,

Defendants.

CASE NO. CV 12 1521 WHA
STIPULATION AND ORDER
TO MODIFY DEADLINES

CTRM: 8
JUDGE: William Alsup

Plaintiff Perfect 10, Inc. ("Perfect 10") and Defendant Yandex N.V. ("Yandex")
by and through their attorneys, hereby stipulate pursuant to Local Rules 6.1 and 6.2 as
follows:

Whereas, the parties entered into an initial stipulation regarding a partial case
schedule on April 13, 2012; and

Whereas that stipulation advised the Court that the parties were working in good
faith to set a more complete schedule for the case, the results of which negotiations are

STIPULATION TO MODIFY DEADLINES

1 reflected in this stipulation; and

2 Whereas, Quinn Emanuel Urquhart & Sullivan was engaged as counsel to
3 Yandex on April 11, 2012 and was provided with a copy of the filings in this action on
4 April 16, 2012; and

5 Whereas, Yandex has agreed not to challenge the sufficiency of the service of
6 process of the summons and complaint or of the Motion for Preliminary Injunction; and

7 Whereas, assuming the summons and complaint were properly served, Yandex's
8 response to the complaint is presently due on Monday April 23, 2012; and

9 Whereas, Yandex is a foreign corporation whose officers reside abroad, are
10 unfamiliar with United States law and for whom English is at most a second language
11 and seek additional time to understand and assess the case as presented; and

12 Whereas, Perfect 10 has agreed that counsel for Yandex should have further
13 additional time to respond to the complaint and Motion for Preliminary Injunction; and

14 Whereas the parties have reached an agreement that does not alter any deadlines
15 imposed by the Court;

16 THEREFORE IT IS STIPULATED AND AGREED:

17 1. that Yandex's responsive pleading to the complaint shall be filed and
18 served on or before May 14, 2012; and

19 2. that Yandex's opposition to the pending Motion for Preliminary Injunction
20 shall be filed and served on or before May 14, 2012; and

21 2. that Perfect 10's reply (if any) in support of the Motion for Preliminary
22 Injunction shall be filed and served on or before June 4, 2012; and

23 3. the hearing on the Montion for Preliminary Injunction shall be continued
24 from May 24, 2012 to June 14, 2012 or as otherwise set by the Court;

25 4. that Yandex shall not challenge the sufficiency of the service of either the
26 summons and complaint or of the Motion for Preliminary Injunction; and

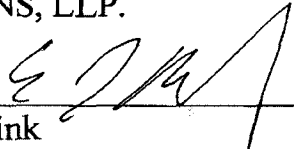
27 6. that neither this Stipulation nor Yandex's waiver of a challenge to the
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1 service of the summons and Motion shall be deemed a general appearance by Yandex.
2 Yandex expressly preserves its defenses and objections to this action, including those
3 based on jurisdiction, venue, and *forum non conveniens*.

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6 **IT IS SO STIPULATED.**

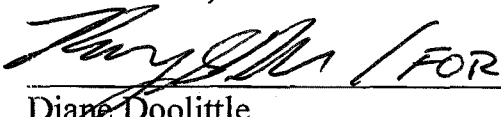
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8 DATED: April 18, 2012

KRAUSE KALFAYAN BENINK
& SLAVENS, LLP.

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10 
11 Eric J. Benink
12 Attorneys for Perfect 10, Inc.


13 DATED: April 18, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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15  FOR
16 Diane Doolittle
17 Attorneys for Yandex, N.V.

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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20 DATED: April 19, 2012.

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22 William Alsup
23 United States District Judge
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